IN THE UNITED STATES BISTRICT COURT DOC #: 173 Filed: 03/23/18 Page: 1 of 2 PAGEID #: 1551 FOR THE SOUTHERN DISTRICT OF OHIO WESTERN DIVISION

[Case No. 1:15-cr-00012] UNITED STATES OF AMERICA v. CHRISTOPHER CORNELL

## [MOTION FOR OUTRAGEOUS GOVERNMENT CONDUCT]

Now comes the defendant, Christopher Cornell ("Cornell"), in the above-entitled matter, and respectfully moves that the investigative conduct violated his right to due process because the governments action was responsible for educing the defendant to break the law.

The FBI informant Provided money and created a friendship with the defendant. Cornell who was a law-abiding citizen was coached by the FBI informant to commit the crime he is being accused of. The FBI targeted a young Muslim, the FBI informant befriended a vulnerable young person, plied him with money and other favors, goading Cornell to express extreme views, then leading him to go along on a plot to commit terror. Cornell had hateful views, but he didn't have the capability to do anything.

Cornell was expressing his 1st amendment rights and engaged in free speech. This case is trumped up and FBI facilitated.

Cornell would not have been able to pull off any sort of plot without the direction and material support of the FBI informant in the case. The FBI informant first contacted Cornell through the internet. The FBI informant came and picked him up from his home, gave him money, and every means to make this happen. The FBI informant was nagging Cornell to participate in a terror plot. The FBI informant provided Cornell with a cell phone to record [martyrdom] videos, a credit card to purchase food and a hotel, a phone number created from Google to acquire firearms, transportation to the gun shop and money for the firearms. None of which Cornell had access to on his own. Cornell had no realistic plans and no guns.

Although he did express desires, but never did he show any predisposition to act before meeting the FBI informant. Cornell had no crime before and no predisposition prior to the FBI informant.

WHEREFORE, defendant, Christopher Cornell ("Cornell") respectfully request the Court allowance of this MOTION.

Christopher Cornell #72795-061 Federal Correctional Institution P.O. Box 420 Fairton, New Jersey 08320

> MANUACE FERTY NOTARY PUBLIC OF NEW JERSEY

Signed before me on 3/16/2018

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